



United States Department of the Interior

NATIONAL PARK SERVICE

1849 C Street, N.W.

Washington, D.C. 20240

IN REPLY REFER TO:

H4215(2255)

OCT 28 2005

Alger-Bristol Hotel, 210 West Sprague Avenue, Spokane, Washington

Project Number

Taxpayer's Identification Number:

Dear

My review of your appeal of the decision of Technical Preservation Services, National Park Service, denying certification of the rehabilitation of the property cited above is concluded. The appeal was initiated and conducted in accordance with Department of the Interior regulations (36 CFR Part 67) governing certifications for Federal income tax incentives for historic preservation as specified in the Internal Revenue Code. Thank you for meeting with me in Washington on October 4, 2005, and for providing a detailed account of the project.

After careful review of the complete record for this project, I have determined that the rehabilitation of the Alger-Bristol Hotel is not consistent with the historic character of the property and the historic district in which it is located, and that the project does not meet Standards 2 and 9 of the Secretary of the Interior's Standards for Rehabilitation. Therefore, the denial issued on July 7, 2005, by Technical Preservation Services is hereby affirmed. However, I have further determined that the project could be brought into conformance with the Standards, and thereby be certified, if the corrective measures described below are undertaken.

Built in 1904, the Alger-Bristol Hotel is located in the East Downtown Spokane Historic District, and was certified as contributing to the significance of the district by Technical Preservation Services (TPS) on August 29, 2003. The nearly completed rehabilitation of this "certified historic structure" was found not to meet the Secretary of the Interior's Standards for Rehabilitation because of the enclosure of the historic lightwell in a manner deemed incompatible with the historic character of the building.

Prior to rehabilitation, an open-air lightwell was an unusual and prominent feature of the Alger-Bristol Hotel. Before efficient electric lighting and air conditioning, lightwells were necessary to bring light and air to the interiors of large buildings. Most lightwells were distinctly functional and located at the rear of a building or between buildings. In the case of the Alger-Bristol Hotel, the lightwell is notable for its size, location, and design. In this case, the two-story lightwell is a large slot in the center of the building with a two-story opening at the center of a principal facade. The vertical opening was made particularly conspicuous by the cornice that spans the opening. The play of light against the sides of the lightwell—visible from the street—and the silhouette of the free span of the cornice against the sky are principal elements of the overall historic character of the building. In the rehabilitation, the lightwell was enclosed at the roof with a new skylight and at the east facade with new glazing supported by wood framing. The photographs presented at our meeting show that the project is still in-progress.

I agree with Technical Preservation Services's evaluation of your project. Your current proposal for enclosing the lightwell has incompatibly altered the lightwell and diminished the integrity of this significant historic feature to an unacceptable degree. The work thereby causes the project not to meet Standards 2 and 9 of the Standards for Rehabilitation. Standard 2 states: "The historic character of a property shall be retained and preserved. The removal of historic materials or alteration of features and spaces that characterize a property shall be avoided." Standard 9 states: "New additions, exterior alterations, or related new construction shall not destroy historic materials that characterize the property. The new work shall be differentiated from the old and shall be compatible with the massing, size, scale, and architectural features to protect the historic integrity of the property and its environment."

At our meeting we reviewed historic and contemporary photographs that purportedly show previous infill of the two-story opening on the east elevation, including photographs of the interior and exterior faces of the opening that you claim show the "ghost" of a previous lightwell enclosure. I agree with Technical Preservation Services that the photographic evidence of possible prior conditions is not substantial enough to firmly establish that the east elevation opening was previously enclosed. Therefore, the rehabilitation as it stands cannot be approved on the basis of your prior-enclosure argument.

However, I believe the harm to the historic character of the building can be adequately remedied if the lightwell's principal historic characteristics were to be recaptured: if the skylight glazing were clear rather than translucent as you stated at our meeting; if the weight and spacing of the skylight framing were to allow views of the sky from the street; if the skylight glazing were continuous from the west end of the lightwell to the back of the east cornice so that the full length of the lightwell is illuminated by daylight and, when viewed from the street, the cornice appears free-span and silhouetted against the sky; and if the wooden framing of the east elevation opening were painted a darker color so that the framing recedes and, overall, the infill appears more open as the opening appeared historically.

If you choose to modify the project as described above, you should submit proposed modifications to me, in care of _____ with a copy to the Washington State Historic Preservation Officer. Bear in mind that this project will remain ineligible for the tax incentives until it is designated a "certified rehabilitation" following completion of the overall project.

As Department of the Interior regulations state, my decision is the final administrative decision regarding rehabilitation certification. A copy of this decision will be provided to the Internal Revenue Service. Questions concerning specific tax consequences of this decision or interpretations of the Internal Revenue Code should be addressed to the appropriate office of the Internal Revenue Service.

Sincerely,

A handwritten signature in black ink, appearing to read "John Robbins", with a long, sweeping horizontal line extending to the right.

John Robbins
Chief Appeals Officer
Cultural Resources

Enclosure

cc: SHPO-WA
IRS